



1 Pursuant to Code of Civil Procedure Section 437c(d) and  
2 California Rules of Court Rule 345, plaintiff Church of  
3 Scientology International ("plaintiff" or "Church") objects to  
4 the admission of each and every document filed by Armstrong in  
5 opposition to the Church's pending motions for summary  
6 adjudication on September 18, 1995, including nine (9) or ten  
7 (10) volumes of evidence, and two separate statements of disputed  
8 and undisputed facts, in toto, on the following grounds:

9 1. The documents were filed by Armstrong in propria  
10 persona at a time when he was represented by counsel;

11 2. Two conflicting sets of documents (one consisting of 10  
12 volumes, and the other of 9) were served on plaintiff's counsel,  
13 giving plaintiff inadequate notice of what was or was not filed  
14 with this Court;

15 3. Armstrong's attorney obtained leave to file documents  
16 with the Court by 10:00 a.m. on September 18, 1995. Armstrong  
17 did not file these documents with the Court on the morning of  
18 September 18 at all.

19 In the alternative, plaintiff asks the Court to strike all  
20 of the documents presently sealed by this Court on September 20,  
21 1995, including the following exhibits to Armstrong's evidence:  
22 Vol. VI, 1(J)(A), 1(J)(M); Vol. VII, 1(J)(A), 1(J)(M); Vol. IX,  
23 2(A), 2(C), 3(B), 5(B), and 7(A); and the exhibits attached to  
24 the Greene and Armstrong declarations submitted in opposition to  
25 plaintiff's ex parte application on September 20, 1995, on the  
26 following grounds:

27 1. The exhibits are copies, altered versions or  
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1 descriptions of protected trade secrets and copyrighted material,  
2 held by the Church as confidential;

3 2. The exhibits are not relevant to any issue to be  
4 determined by this Court; indeed, the content of religious  
5 scripture is irrelevant to any judicial proceeding, particularly  
6 where, as here, it is offered solely to contrast it with the  
7 claimed scriptures of other religions; and

8 3. The exhibits were offered by Armstrong solely for an  
9 improper purpose: that is, to use the files of this Court as a  
10 soapbox from which to engage in still further breaches of his  
11 Agreement with the Church.

12 Further, and in the alternative, plaintiff specifically  
13 objects to the admission of each of the following exhibits by  
14 Armstrong, on the grounds further described in the accompanying  
15 memorandum of points and authorities: Ex. 1; Ex. 1(A);  
16 Ex. 1(A)(A); Ex. 1(A)(B); Ex. 1(A)(C); Ex. 1(A)(D); Ex. 1(A)(E);  
17 Ex. 1(A)(F); Ex. 1(A)(G); Ex. 1(A)(I); Ex. 1(A)(K); Ex. 1(A)(L);  
18 Ex. 1(A)(M); Ex. 1(A)(N); Ex. 1(A)(O); Ex. 1(A)(P); Ex. 1(A)(Q);  
19 Ex. 1(B); Ex. 1(B)(B); Ex. 1(B)(C); Ex. 1(B)(D); Ex. 1(B)(E);  
20 Ex. 1(B)(F); Ex. 1(B)(G); Ex. 1(B)(H); Ex. 1(B)(I); Ex. 1(B)(J);  
21 Ex. 1(B)(K); Ex. 1(B)(L); Ex. 1(B)(M); Ex. 1(B)(N); Ex. 1(B)(O)  
22 and all exhibits thereto; Ex. 1(B)(P) and all exhibits thereto;  
23 Ex. 1(B)(Q) and all exhibits thereto; Ex. 1(C) and all exhibits  
24 thereto; Ex. 1(D) and all exhibits thereto; Ex. 1(E) and all  
25 exhibits thereto; Ex. 1(J) and all exhibits thereto; Ex. 1(K);  
26 Ex. 1(O); Ex. 1(P); Ex. 1(Q); Ex. 1(S); Ex. 1(T); Ex. 1(U);  
27 Ex. 1(V); Ex. 1(W); Ex. 1(X); Ex. 1(Y); Ex. 1(AA); Ex. 1(CC); Ex.

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1 2 and all exhibits thereto; Ex. 3 and all exhibits thereto; Ex. 4  
2 and all exhibits thereto; Ex. 5 and all exhibits thereto;  
3 Ex. 1(G); Ex. 1(G)(A); Ex. 1(G)(B); Ex. 1(G)(C); Ex. 1(G)(M);  
4 Ex. 1(G)(N); Ex. 1(G)(O); Ex. 1(G)(P); Ex. 1(H)(F); Ex. 1(H)(P);  
5 Ex. 1(H)(R); Ex. 1(H)(R)(A); Ex. 1(H)(R)(X); Ex. 1(H)(R)(CC);  
6 Ex. 1(H)(R)(DD); Ex. 1(H)(R)(EE); Ex. 1(H)(R)(FF); Ex. 1(H)(S);  
7 Ex. 1(H)(Z); Ex. 1(H)(CC); Ex. 1(H)(DD); Ex. 1(I); Ex. 1(I)(A);  
8 Ex. 1(I)(II); Ex. 6 and all exhibits thereto; Ex. 7 and all  
9 exhibits thereto; Ex. 8 and all exhibits thereto; Ex. 10; Ex.  
10 10(A).

11 Dated: September 26, 1995

Respectfully submitted,

MOXON & BARTILSON

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13  
14 By:   
15 Laurie J. Bartilson

16 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO

17 Attorneys for plaintiff  
18 CHURCH OF SCIENTOLOGY  
INTERNATIONAL  
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PROOF OF SERVICE

STATE OF CALIFORNIA            )  
  )    ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of California, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On September 26, 1995, I served the foregoing document described as CHURCH OF SCIENTOLOGY INTERNATIONAL'S OBJECTIONS TO ARMSTRONG'S EVIDENCE IN SUPPORT OF OPPOSITION TO PLAINTIFF'S PENDING MOTIONS FOR SUMMARY ADJUDICATION; MOTION TO STRIKE EVIDENCE; AND REQUEST FOR SANCTIONS FROM GERALD ARMSTRONG AND FORD GREENE [C.C.P. § 437c(i)]; CHURCH OF SCIENTOLOGY INTERNATIONAL'S OBJECTIONS TO ARMSTRONG'S EVIDENCE IN SUPPORT OF OPPOSITION TO PLAINTIFF'S PENDING MOTIONS FOR SUMMARY ADJUDICATION; MOTION TO STRIKE EVIDENCE; AND REQUEST FOR SANCTIONS AGAINST GERALD ARMSTRONG AND FORD GREENE [C.C.P. § 437c(i)]; REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFF'S OBJECTIONS TO ARMSTRONG'S EVIDENCE IN OPPOSITION TO PLAINTIFF'S PENDING MOTIONS FOR SUMMARY ADJUDICATION on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

GERALD ARMSTRONG  
715 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 9493

BY MAIL

\*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on \_\_\_\_\_ at \_\_\_\_\_, California.

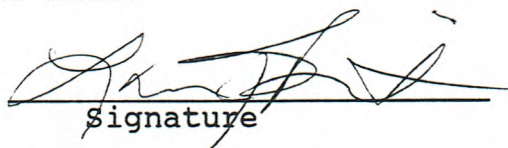
\*\*(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on September 26, 1995, at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Winnie Bush  
Print or Type Name

  
Signature

\* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

\*\* (For personal service signature must be that of messenger)